

PLANT 3

ATTACHMENT A
AGRIUM KNO FACILITY
CONTINUOUS RELEASE-EMERGENCY RESPONSE NOTIFICATION SYSTEM REPORT

Attachment to LOT - ENV-071022
Kenai Nitrogen Operations

SECTION I: GENERAL INFORMATION

CR-ERNS Number: 44607

Date of Initial Release:

Date of Initial Call to NRC: 10/23/90

Type of Report: Indicate below the type of report you are submitting.

<input type="checkbox"/> Initial Written Notification	<input type="checkbox"/> First Anniversary Follow-up Report	<input checked="" type="checkbox"/> Written Notification of a Change to Initial Notification	<input type="checkbox"/> Written Notification of a Change to Follow-up Report
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Signed Statement: I certify that the hazardous substances releases described herein are continuous and stable in quantity and rate under the definitions in 40 CFR 302.8(a) or 355.4(a)(2)(iii) and that all submitted information is accurate and current to the best of my knowledge.

8/13/99

Date

M. L. Nugent, Plant Manager

Name and Position

M. L. Nugent
Signature

Part A. Facility or Vessel Information

Name of Facility or Vessel

Alaska Nitrogen Products LLC
Kenai Plant

Person in Charge of Facility or Vessel

Name of Person in Charge M. L. Nugent

Position Plant Manager

Telephone No. (907) 776-8121

Alternate Telephone No. () None

Facility Address or Vessel Port of Registration

Street Mile 21 Spur Highway

County Kenai Peninsula Borough

City Kenai

State AK

Zip Code 99611

Dun and Bradstreet Number for Facility

092876390

Facility/Vessel Location

Latitude Deg N 60 Min 40 Sec 22

Longitude Deg W 151 Min 22 Sec 36

Vessel LORAN Coordinates

Part B. Population Information

Population Density

Choose the range that describes the population density within a one-mile radius of your facility or vessel (Indicate by placing an "X" in the appropriate blank below.)

<input checked="" type="checkbox"/> 0 - 50 persons	<input type="checkbox"/> 101 - 500 persons	<input type="checkbox"/> more than 1000 persons
<input type="checkbox"/> 51 - 100 persons	<input type="checkbox"/> 501 - 1000 persons	

Sensitive Populations and Ecosystems Within one Mile Radius

Sensitive Populations or Ecosystems
(e.g., schools, hospitals, wetlands, wildlife preserves, etc.)

NONE

Distance and direction from facility

**SECTION II: SOURCE
INFORMATION**

CR-ERNS Number

44607

Part A: Basis for Asserting the Release is Continuous and Stable in Quantity and Rate. For EACH source of a release of a hazardous substance or mixture from your facility or vessel, provide the following information on a SEPARATE sheet. Photocopy this page if necessary.

Name of Source: Plant 3, Oil/Water Separator, F-1715

1. Indicate whether the release from this source is either:

continuous without interruption _____ OR routine, anticipated, intermittent X

2. Identify the activity(ies) that results in the release from this source (e.g., batch process, filling of a storage tank). If malfunction, describe the malfunction and explain why the release from the malfunction should be considered continuous and stable in quantity and rate.*

Oil water is generated through routine production and maintenance activities. Ammonia occasionally becomes entrained in the oily water, which is transferred to the oil/water separator tank (F1715) for treatment. The F-1715 tank is heated to enhance the separation between oil and water, resulting in ammonia being released to the atmosphere. Since this is a planned and routine activity, this release qualifies for reduced reporting as a routine and continuous release.

3. Identify below how you established the pattern of release and calculated release estimates.

<u> </u> Past release data	<u> </u> Knowledge of the facility/vessel's operations and release history	<u> X </u> Engineering estimate
<u> </u> AP-42 test	<u> </u> Best professional judgment	<u> X </u> Other (explain) Flow Measurement

* Note that unanticipated events, such as spills, pipe ruptures, equipment failures, emergency shutdowns, or accidents, do not qualify for reduced reporting under CERCLA section 103(f)(2). Unanticipated events are not incidental to normal operations and, by definition, are not continuous or anticipated, and are not sufficiently predictable or regular to be considered stable in quantity and rate.

SECTION II: SOURCE INFORMATION
(continued)

CR-ERNS Number

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Name of Source: Plant 3, Oil/Water Separator, F-1715

Part B: Specific Information on the Source

For the source identified above, provide the following information. Please provide a SEPARATE sheet for EACH source. Photocopy this page if necessary.

AFFECTED MEDIUM. Identify the environmental medium (i.e., air, surface water, soil, or ground water) that is affected by the release from this source. If your source releases hazardous substances to more than one medium (e.g., a wastepile releasing to air and ground water), treat the release to **EACH** medium as a separate source and complete Section II, Parts A, B, and C, of this format for **EACH** medium affected.

☐ **AIR** X (stack X or area) If the medium affected is air, please also specify whether the source is a stack or a ground-based area source.

- If identified source is a **stack**, indicate stack height: 20 feet or meters; **OR**
- If identified source is an **area source** (e.g., waste pile, landfill, valves, tank vents, pump seals, fugitive emissions), indicate surface area: square feet or square meters.

☐ **SURFACE WATER** (stream , lake , or other)

- If the release affects any **surface water body**, give the name of the water body.
- If the release affects a **stream**, give the stream order or average flow rate, in cubic feet per second.
stream order: or average flow rate: cubic feet/second; **OR**
- If the release affects a **lake**, give the surface area of the lake in acres and the average depth in meters.
surface area of lake: acres and average depth of lake: meters.

☐ **SOIL OR GROUND WATER**

If the release is on or under ground, indicate the distance to the closest water well.

Optional Information

The following information is not required in the final rule; however, such information will assist EPA in evaluating the risks associated with the continuous release. **If this information is not provided, EPA will make conservative assumptions about the appropriate values.** Please note that the units specified below are suggested units. You may use other units; however, be certain that the units are clearly identified.

- For a stack release to air, provide the following information, if available:
Inside diameter 3 feet or meters
Gas Exit Velocity unknown feet/second or meters/seconds
Gas Temperature 200 degrees Fahrenheit, Kelvin, or Celsius

- For a release to surface water, provide the following information, if available:
Average Velocity feet/second of Surface Water

SECTION II: SOURCE INFORMATION
(continued)

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Part C. Identity and Quantity of Each Hazardous Substance or Mixture Released From Each Source
Please provide a SEPARATE sheet for EACH source. Photocopy this page if necessary.

Name of Source: Plant 3, Oil/Water Separator, F-1715

List each hazardous substance released from the source identified above and provide the following information. (For an example, see Table 1 of Reporting Requirements for Continuous Releases of Hazardous Substances - A Guide for Facilities and Vessels on Compliance.)

Name of Hazardous Substance	CASRN #	Normal Range (in lbs. or kg per day)*		Number of Releases (per year)	Total Quantity Released in Previous Year (in lbs. or kg)*	Months of the Release
		Upper Bound	Lower Bound			
Ammonia	7664-41-7	1500	0	100	2,000	All

List each mixture released from the source identified above and provide the following information. (For an example, see Table 2 of Reporting Requirements for Continuous Releases of Hazardous Substances - A Guide for Facilities and Vessels on Compliance.)

Name of Mixture	Name of Hazardous Substance Components	CASRN#	Weight Percentage	Normal Range of Components (in lbs. or kg per day)*		Normal Range of Mixture (in lbs. or kg per day)*		Number of Releases (per year)	Total Quantity of Mixture Released in Previous Year (in lbs. or kg)	Months of the Release
				Upper Bound	Lower Bound	Upper Bound	Lower Bound			
N/A										

* Please be sure to include units where appropriate. Also, if the release is a radionuclide, units of curies (Ci) are appropriate.

